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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

DERRICK SATCHELL, KALINI BOYKIN,  
 VALERIE BROWN, RICK GONZALES,  
 CYNTHIA GUERRERO, RACHEL  
 HUTCHINS, TYRONE MERRITT, KELVIN  
 SMITH, SR., and KEN STEVENSON, on  
 behalf of themselves and all others similarly  
 situated,

Plaintiffs,

v.

FEDEX EXPRESS, a Delaware corporation,  
 Defendant.

Case No. C 03-2659 SI; C 03-2878 SI

CLASS ACTION

**STIPULATION AND [PROPOSED]  
 ORDER RE: PRODUCTION OF  
 COMPUTER-READABLE DATA FOR  
 1997-1998 AND 2004-2005**

A. Whereas, on November 19, 2005, the Court ordered Defendant to "produce complete computer-readable personnel and payroll data for employees in FedEx's Western Region from January 1, 1997 to December 31, 1998, regardless of the employee's termination date, by December 22, 2005";

B. Whereas, Plaintiffs have also requested that FedEx produce, and FedEx has agreed to produce, complete computer-readable personnel and payroll data for employees in FedEx's Western Region from February 6, 2004 through December 31, 2005;

C. Whereas, it is easier for FedEx to produce complete data for the entire time period at one time, rather than produce portions piecemeal;

D. Whereas, FedEx will be able to produce all of the data by February 3, 2006;

The parties to the above captioned actions, through their counsel of record, hereby stipulate and agree as follows:

1. On or before February 3, 2006, Defendant shall produce complete computer-readable personnel and payroll data for employees in FedEx's Western Region for the time period from January 1, 1997 through December 31, 2005.

Dated: January 20, 2006

LIEFE, CABRASER, HEIMANN & BERNSTEIN, LLP

By: 

James M. Finberg

*Class Counsel*

Dated: January 20, 2006

SEYFARTH & SHAW LLP

By: 

Frederick L. Douglas

*with permission*

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